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February 3, 2004

Mr. Mike Leavitt, Administrator
U. S. Environmental Protection Agency
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Merrifield, VA 22116

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Re: Information contained in the EPA HPV Challenge Program Tracking System website

Dear Administrator Leavitt:

The purpose of this letter is to request that the Agency update and correct information currently contained in the **HPV Challenge Summary Report** in the EPA HPV Challenge Program tracking system that is located on the EPA website. Specifically we wish to correct entries concerning PPG sponsorship of certain materials in the HPV Challenge Program. The specifics of the information to be corrected are as follows:

- The HPV Challenge Program website, contains an **HPV Challenge Summary Report**. In this report there is a listing of various categories of commitments companies and consortia have made to the HPV Challenge Program. In the portion of the website titled **Full Commitment to the HPV Challenge**, PPG is listed as sponsoring *Ethylene, tetrachloro (CAS No. 127-18-4)*; *Carbon Disulfide (CAS No. 75-15-0)*; and *Ethylene, trichloro (CAS No. 79-01-6)*. This information is not correct. Additionally, corrections are needed for information on the chemical *z-ASP, L-Aspartic acid, N-[(phenylmethoxy)carbonyl]- (CAS No. 1152-61-0)*.
 - For *Ethylene, tetrachloro (CAS No. 127-18-4)* and *Ethylene, trichloro (CAS No. 79-01-6)*, in the EPA HPV Challenge database this chemical has been assigned an indicator of 2, i.e. *being handled under the OECD SIDS Program*. PPG did **not** volunteer to sponsor either of these materials and specifically notified the Agency that PPG would **not** sponsor these materials because they were being handled in the OECD SIDS program. These chemicals should be removed from this section of the database.

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- For **Carbon Disulfide (CAS No. 75-15-0)**, in the EPA HPV Challenge database this chemical has been assigned an indicator of 3, i.e. *not subject to the HPV Challenge Program because it is classified as an inorganic chemical*. PPG did **not** volunteer to sponsor this chemical and notified the Agency that PPG would **not** sponsor this material because it was being handled in the OECD SIDS program. This chemical should be removed from this section of the database and references to PPG as a sponsor for this chemical should be removed from the **1990 HPV Chemical List** on the website.
- For the chemical z-ASP, **L-Aspartic acid, N-[(phenylmethoxy)carbonyl]- (CAS No. 1152-61-0)**, the website states "Consortia to be Determined". No consortium has been formed and PPG is the sole sponsor of this chemical. Based on an Agency review of information supplied by PPG, PPG has been informed by the Agency that this material has now been assigned an indicator of 1, i.e. *not considered a Candidate for Testing*. This change in classification needs to be incorporated into the appropriate areas in the HPV Challenge Program database. It would also be desirable to remove the year 2002 from the portion of the website titled **Full Commitment to the HPV Challenge**.
- A second section of the **HPV Challenge Summary Report** contains various commitments made on HPV chemicals in the ICCA HPV initiative. In this section of the website titled **ICCA**, certain information concerning PPG's sponsorship of the following materials needs to be corrected.
 - For **Peroxydicarbonic acid, diisopropyl ester (CAS No. 105-64-6)**, PPG is sponsoring this material as a member of the consortium **Society of the Plastics Industry, Organic Peroxide Producers Safety Division**. The name of the consortium should be listed as part of the information on this chemical.
 - For **Ethyl Chloride (CAS No. 760-67-8)**, the website currently states "In new unnamed SOCMA consortium". As the Agency has been informed, the sponsoring consortium is the **Chloroethane Producers Consortium**, organized under SOCMA. This information needs to be updated.
 - For the nine chemicals sponsored by the SOCMA Chloroformates / Acid Chlorides Consortium (CFACC), the commitment year should be changed based on correspondence from the panel indicating the intent of the group to amend the original commitment and submit information in 2003 rather than in 2002.
 - For the material listed in the website as **"Ethylene, 1,1-dichloro (CAS No. 75-01-4)"** sponsored by the ACC Vinyl Chloride Health Committee, the chemical name is incorrect. The correct name should be **Ethene, chloro**. This information should be corrected.

We appreciate the efforts of the Agency to manage the large amount of information from the HPV Challenge Program, and hope that these corrections will help in assuring the accuracy of the information available to the public.

Yours truly,

James A. Barter